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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE THALOMID AND REVLIMID  
ANTITRUST LITIGATION

Civil Action No. 2:14-cv-06997-MCA-MAH

Return Date: April 1, 2019

(Document Filed Electronically)

**NOTICE OF JOINT MOTION TO SEAL MATERIALS RELATED TO CLASS  
PLAINTIFFS' RENEWED MOTION FOR CLASS CERTIFICATION AND  
APPOINTMENT OF CLASS COUNSEL**

**PLEASE TAKE NOTICE** that on April 1, 2019, or as soon thereafter as counsel may be heard, attorneys for Plaintiffs and for Defendant will move before the District Court, at the United States District Court, District of New Jersey, Martin Luther King, Jr. Federal Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07102, for an Order permanently sealing specific portions of the class certification briefing materials (Dkt. Nos. 265, 269, and 274) filed by Plaintiffs and Celgene.

**PLEASE TAKE FURTHER NOTICE** that in support of their Motion, Plaintiffs and

Celgene shall rely upon the accompanying Index and Declarations of Daniel B. Rehns and Brian R. Howe. A Proposed Order, including Proposed Findings of Fact and Conclusions of Law, is also submitted for the Court's consideration.

**PLEASE TAKE FURTHER NOTICE** that the proposed redacted versions of the renewed class certification motion briefing materials (Dkt. Nos. 265, 269, and 274) are attached hereto as Exhibit A.

Dated: March 1, 2019

Respectfully submitted,

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